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13 International Pty, Ltd.*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 BZ CLARITY TENT SUB LLC, dba BASE
17 ENTERTAINMENT,

18 Case No.: 2:15-cv-01065-JCM-CWH

19 Plaintiff,

20 **STIPULATION AND [PROPOSED]
21 ORDER FOR EXTENSION TO FILE
22 INTERIM STATUS REPORT AND
23 MAKE EXPERT DESIGNATIONS
24 [SECOND REQUEST FOR
25 EXTENSION]**

26 v.
27 ROSS MOLLISON INTERNATIONAL
28 PTY, LTD.,

29 Defendant.

30 AND ALL RELATED CLAIMS.

31 Discovery Closes: **March 3, 2016**

32 Pretrial Order: **June 1, 2016**

33 Trial: **TBD**

34 Pursuant to Local Rule 26-4, IT IS HEREBY STIPULATED AND AGREED by and
35 between Plaintiff BZ Clarity Tent Sub LLC, d/b/a BASE ENTERTAINMENT ("BASE"), and
36 Defendant Ross Mollison International Pty Ltd ("RMP"), that the deadline for submitting the
37 January 4, 2016 interim status report required by L.R. 26-3, and the deadline for plaintiff's
38 disclosure of experts, both be extended from **January 4, 2016 to January 8, 2016**. No other
39 deadline extensions are sought.

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1 The parties request this brief extension because of the voluminous nature of discovery in
2 this case, and the pendency of BASE's recent motion to amend its claims.

3 1. Discovery completed:

4 a. To date, the parties have exchanged their initial disclosure documents
5 pursuant to FRCP 26(f).

6 b. Plaintiffs served first request for admissions on August 4, 2015.

7 c. Plaintiffs served first request for production of documents on August 4, 2015.

8 d. Plaintiffs served first interrogatories on August 4, 2015.

9 e. Defendants served initial disclosures on August 10, 2015.

10 f. Plaintiffs served initial disclosures on August 19, 2015.

11 g. Defendants served first request for admissions on September 11, 2015.

12 h. Defendants served first request for production of documents on September 11,
13 2015.

14 i. Defendants served first interrogatories on September 11, 2015.

15 j. Defendants served first supplemental disclosures on September 22, 2015.

16 k. Defendants served answers to first request for production of documents on
17 September 22, 2015.

18 l. Defendants served answers first request for admissions on September 22,
19 2015.

20 m. Defendants served answers to interrogatories on September 22, 2015.

21 n. Defendants served supplemental answers to first request for production of
22 documents on September 23, 2015.

23 o. Defendants served second supplemental disclosures on September 23, 2015.

24 p. Plaintiffs served answers to first request for admissions on November 6, 2015.

25 q. Plaintiffs served answers to production of documents on November 6, 2015.

26 r. Plaintiffs served answers to first request for production of documents on
27 November 6, 2015.

28 s. Plaintiffs served first supplemental disclosures on November 6, 2015.

2 2. Discovery Remaining:

1 a. Supplemental Document and Electronic Data Production in response to
2 Written Discovery Requests
3 b. Depositions of parties and third parties.
4 c. Written Discovery and Subpoenas on Third Parties.
5 d. Follow up Written Discovery Requests.
6 e. Expert Witness Disclosures.
7 f. Rebuttal Witness Disclosures.
8 g. Expert/Rebuttal Witness(es) Depositions.
9 3. Proposed Modification: Based on the foregoing, the parties seek to modify the
10 discovery plan as follows:
11 a. Deadline for interim status report required by L.R. 26-3: Extended from **January 4,**
12 **2016 to January 8, 2016.**
13 b. Deadline for plaintiff's disclosure of experts: Extended from **January 4, 2016 to**
14 **January 8, 2016.**
15 4. This request is made in good faith and not for purposes of delay.
16 IT IS SO STIPULATED.
17 DATED this 4th day of January, 2016. DATED this 4th day of January, 2016
18 PISANELLI BICE PLLC GREENBERG TRAURIG, LLC
19 By: /s/ Miles N. Clark By: /s/ Tyler R. Andrews
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23 Attorneys for Defendant Attorneys for Plaintiff

24 **ORDER**
25 Upon stipulation of counsel and good cause appearing therefore,
26 The above AGREEMENT AND STIPULATION IS SO ORDERED.
27 DATED: January 5, 2016

28 
UNITED STATES MAGISTRATE JUDGE